

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

REBECCA ANN LYNCH, LARRY D.
SCHULTZ, and BRITTANY LANIER, on
behalf of THEMSELVES and All Others
Similarly Situated,

Plaintiffs,

v.

LAWRENCEBURG NH OPERATIONS,
LLC d/b/a COUNTRYSIDE
HEALTHCARE AND
REHABILITATION,

Defendant.

COLLECTIVE ACTION

CIVIL ACTION

CASE NO. 1:13-cv-129

JUDGE HAYNES

*OWASH
This motion
was accepted
DKH 88 and as DEWED
as most
J. [Signature]
[Signature]
6-23-14*

JOINT MOTION FOR ENTRY OF CASE MANAGEMENT ORDER

Plaintiffs and Defendant respectfully request that the Court enter the attached Case Management Order, which extends certain deadlines in this litigation by approximately one month. The parties have scheduled a mediation of this matter on July 24, 2014. Should the parties not resolve Plaintiffs' claims at that time, the parties expect the deadline extensions requested herein will allow the Parties to complete fact discovery, expert discovery, and motions practice without seeking a continuance of the February 17, 2015 trial.

The extensions requested herein will not affect the October 13, 2014 deadline for the parties to file dispositive motions, which complies with the Court's Local Rule 16.01(d)(2)(f) that dispositive motions be fully briefed no less than ninety (90) days before trial.

Dated: June 23, 2014

Respectfully submitted,

/s/ Scott P. Tift

GEORGE E. BARRETT (No. 2672)

JERRY E. MARTIN (No. 20193)